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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA THOMAS, ) Case No.: 2:22-cv-00571-VCF  
Plaintiff, )  
vs. ) **UNOPPOSED MOTION FOR EXTENSION OF  
TIME**  
KILOLO KIJAKAZI, ) **(FIRST REQUEST)**  
Acting Commissioner of Social Security, )  
Defendant. )

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Defendant, the Acting Commissioner of Social Security, through the undersigned counsel, hereby requests a 30-day extension of time to respond to Plaintiff's Motion for Reversal and/or Remand, which is currently due on or before August 31, 2022. The new proposed deadline is September 30, 2022.

Good cause exists for this request because the undersigned attorney and Defendant's counsel of record has resigned from the Office of the General Counsel for the Social Security Administration, and is currently transitioning her matters to other attorneys. Additional time is required so that the new attorney has time to review Plaintiff's motion and case file in order to determine whether this matter can be resolved by settlement, or whether the Commissioner will respond by filing an answering brief. This request is made in good faith and is not intended to delay the proceedings in this matter. Counsel apologizes to the Court and Plaintiff's counsel for the inconvenience.

On August 3, 2022, the undersigned conferred with Plaintiff's counsel, who has no opposition to the requested extension.

It is therefore respectfully requested that Defendant be granted a 30-day extension of time to file a response to Plaintiff's Motion for Reversal and/or Remand, through and including September 30, 2022.

Dated: August 4, 2022

JASON M. FRIERSON  
United States Attorney

/s/ Allison J. Cheung  
ALLISON J. CHEUNG  
Special Assistant United States Attorney

## IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

8-4-2022

1                   **CERTIFICATE OF SERVICE**

2                   I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My  
3 business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the  
4 above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR**  
5 **EXTENSION OF TIME** on the following parties by electronically filing the foregoing with the Clerk of  
6 the District Court using its ECF System, which provides electronic notice of the filing:

7                   Marc Kalagian  
8                   marc.kalagian@rksslaw.com  
9                   Attorney for Plaintiff

10                  I declare under penalty of perjury that the foregoing is true and correct.

11                  Dated: August 4, 2022

12                  */s/ Allison J. Cheung*  
13                  ALLISON J. CHEUNG  
14                  Special Assistant United States Attorney